

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE**

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|--|---|---------------------------------|
| TRACY MORTON, On behalf of HERSELF and All Others Similarly Situated, |) | CLASS ACTION |
| |) | CIVIL ACTION |
| <i>Plaintiff,</i> |) | |
| |) | CASE NO. 3:13-cv-1012 |
| v. |) | |
| |) | JUDGE SHARP |
| VANDERBILT UNIVERSITY, |) | MAGISTRATE JUDGE GRIFFIN |
| |) | |
| <i>Defendant.</i> |) | |

**PLAINTIFF'S UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF SETTLEMENT**

Plaintiff Tracy Morton, on her own behalf and in her capacity as the Court-appointed Class Representative, respectfully moves this Court pursuant to Federal Rule of Civil Procedure 23 for an Order preliminarily approving the contemporaneously-filed Release and Settlement Agreement dated January 29, 2015 (the "Agreement"); approving the form and manner of notice to the Class; and scheduling a final hearing date.

This motion is based upon the accompanying Plaintiff's Memorandum in Support of Plaintiff's Unopposed Motion for Preliminary Approval of Settlement, the Agreement and its exhibits, the papers and filings on record in this matter, and such additional evidence or argument as may be presented at the final hearing.

A proposed order preliminarily approving the Agreement and providing for notice is attached as an exhibit to this motion.

Dated: January 30, 2015

Respectfully submitted,

/s/ Jerry E. Martin
JERRY E. MARTIN (No. 20193)

DAVID W. GARRISON (No. 24968)
SCOTT P. TIFT (No. 27592)
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CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing *Plaintiff's Unopposed Motion for Preliminary Approval of Settlement* has been served on the following via the Court's ECF filing system on January 30, 2015:

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/s/ Jerry E. Martin
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